

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

AMBER WOOD, *et. al*, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

FCA US LLC,

Defendant.

Case No. 5:20-cv-11054-JEL-APP

District Judge Judith E. Levy

Magistrate Judge Anthony P. Patti

**BUSH SEYFERTH PLLC’S NOTICE OF SCREENING
PURSUANT TO MICHIGAN RULE OF PROFESSIONAL CONDUCT
1.10(B)**

Bush Seyferth PLLC (“BSP”), counsel for Defendant FCA US LLC, hereby gives written notice to this Court and the parties that Mahde Abdallah, formerly an associate at Miller Law Firm, PC, counsel for Plaintiffs, will join BSP as an associate effective August 2, 2021.

Pursuant to Michigan Rule of Professional Conduct 1.10(b), BSP has screened Mr. Abdallah from this matter as follows:

1. BSP distributed a memo to the entire firm giving notice of the screen.
2. Mr. Abdallah has signed a document acknowledging the screen and his responsibility to preserve and to not disclose any confidences he may have regarding this case.

3. The screening memo instructed each BSP attorney representing FCA US LLC in this matter to not discuss this matter with Mr. Abdallah and to not allow him access to case materials.

4. BSP's administrator, who manages BSP's electronic records database, has likewise been instructed to not allow Mr. Abdallah access to case materials.

5. A screening restriction has been entered into BSP's electronic records database prohibiting Mr. Abdallah from accessing BSP's electronic files for this matter.

6. Compensation for Mr. Abdallah will not be determined by or apportioned from any fees that BSP earns through its representation of FCA US LLC in this matter.

This notice is given pursuant to the requirements of Michigan Rule of Professional Conduct 1.10(b)(2).

Respectfully submitted,

By: /s/ Patrick G. Seyferth
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Dated: August 3, 2021